

# EXHIBIT A

Highly Confidential - Larry Russell

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MICHIGAN  
3 SOUTHERN DIVISION  
4 \_\_\_\_\_  
5 )  
6 ) Case No.  
7 ) 5:16-cv-10444-JEL-EAS  
8 In re: FLINT WATER CASES ) (consolidated)  
9 )  
10 Bellwether III ) Case No. 17-10164  
11 )  
12 \_\_\_\_\_) Hon. Judith E. Levy

13  
14 HIGHLY CONFIDENTIAL  
15 Monday, November 20, 2023

16 Remote videotaped deposition of  
17 LARRY L RUSSELL, Ph.D., commencing at 8:14 a.m., on  
18 the above date before Carol A. Kirk, Registered Merit  
19 Reporter, Certified Shorthand Reporter, and Notary  
20 Public.

21  
22  
23 GOLKOW LITIGATION SERVICES  
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deps@golkow.com

1 Veolia's experts?

2 A. No.

3 Q. Okay. Within this rebuttal  
4 report, Exhibit 2, as well as other reports, you  
5 talk about the pipes that you've removed and  
6 done some analysis of from the two homes in  
7 Flint, correct?

8 A. Yes, sir.

9 Q. Okay. And I think you testified  
10 briefly that those two homes are not the homes  
11 of any of the individuals who are plaintiffs in  
12 these cases, what we call as Bellwether III,  
13 correct?

14 A. Yes.

15 Q. Okay. And I think you testified  
16 before that you've not visited or examined any  
17 of the homes of the Bellwether III plaintiffs,  
18 correct?

19 A. Yes.

20 Q. Okay. So my question,  
21 Dr. Russell, is, understanding that the pipes  
22 that you have looked at and analyzed are not  
23 from the Bellwether III homes, in your view what  
24 is the relevance of your opinions with respect

1 to those pipes to the Bellwether III plaintiffs?

2 A. The relevance is that the  
3 conditions of those pipes are presumably similar  
4 to the conditions in the homes of the plaintiffs  
5 for this matter. And the thinking there is that  
6 they've been exposed to the same water --  
7 there's only one water source in Flint -- and  
8 have seen similar issues with respect to the  
9 water quality that has been served in Flint.

10 In addition, I have reviewed the  
11 site reports prepared by the Veolia folks for  
12 each of the homes that are the plaintiffs in  
13 this matter.

14 Q. Okay. But you've not offered any  
15 opinions with respect to those site reports or  
16 those homes; isn't that true?

17 A. Not specifically with respect to  
18 the site reports or the inspection reports.  
19 They were done in the same format as the ones  
20 for the Class homes, the one on Montclair and  
21 the one on Grace Street, and conveyed similar  
22 information.

23 Q. Okay. Dr. Russell, in this  
24 report, Exhibit 2, you criticize various experts